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CATHOLIC SOCIAL TEACHING ON WORK

By David L. Gregory

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CATHOLIC SOCIAL TEACHING ON WORK

For more than a century, the Catholic Church has been the world's most eloquent and consistent voice for the rights of all workers.¹ In the contemporary era of the transmogrifying workplace, and in cyberspace's global village, the social teaching of the Catholic Church remains the timeless, and most timely, beacon for fundamental human dignity.

The anniversary in 1997 of the first fifty years of the Taft-Hartley Act is an especially apt setting for highlighting the Church's contributions to workers' rights.

It is always interesting to commemorate legislative anniversaries, and to assess the influences of the passage of time since the enactment of any particular important law. It is also important to celebrate the histories of institutions.

¹ See, POPE LEO XIII, RERUM NOVARUM (THE CONDITION OF LABOR) (1891); POPE PIUS XI, QUADREGESIMO ANNO (FORTY YEARS) (1931); POPE PIUS XII, SERTUM LAETITIAE (CROWN OF JOY) (1939); POPE JOHN XXIII, MATER ET MAGISTRA (MOTHER AND TEACHER) (1961); SECOND VATICAN COUNCIL, GAUDIUM ET SPES (PASTORAL CONSTITUTION ON THE CHURCH IN THE MODERN WORLD) (1965); POPE PAUL VI, POPULORUM PROGRESSIO (1967); POPE PAUL VI, OCTOGESIMA ADVENIENS (A CALL TO ACTION); (1971) POPE JOHN PAUL II, LABOREM EXERCENS (ON HUMAN WORK) (1981); POPE JOHN PAUL II, SOLICITUDO REI SOCIALIS (1987); POPE JOHN PAUL II, CENTESIMUS ANNUS (ON THE HUNDREDTH ANNIVERSARY OF RERUM NOVARUM) (1991). See, GREGORY BAUM, THE PRIORITY OF LABOR (1982); GEORGE G. HIGGINS, ORGANIZED LABOR AND THE CHURCH: REFLECTIONS OF A "LABOR PRIEST" (1993). CO-CREATION AND CAPITALISM: JOHN PAUL II'S LABOREM EXERCENS (JOHN W. HOUCK AND OLIVER F. WILLIAMS, EDS.) (1983); CATHOLIC SOCIAL THOUGHT: THE DOCUMENTARY HERITAGE (DAVID J. O'BRIEN AND THOMAS SHANNON, EDS.) (1992). Catholic social teaching is an evolving body of ecclesiastical documents and a rich tradition of particular, heterogeneous applications. Pope John Paul II was a powerful champion of the Solidarity movement, a labor union political initiative which brought down the Communist government

of Poland. The Canadian and United States Bishops also have been eloquent spokespersons for the rights of workers. U.S. NATIONAL CONFERENCE OF CATHOLIC BISHOPS PASTORAL LETTER ECONOMIC JUSTICE FOR ALL (1986); CATHOLIC FRAMEWORK FOR ECONOMIC LIFE (1996). The most influential early work on Catholic social teaching on labor in the United States was that of Monsignor John A. Ryan, one of Monsignor George Higgins' intellectual mentors at the Catholic University of America. See, JOHN A. RYAN, A LIVING WAGE (1906); DISTRIBUTIVE JUSTICE (1916). I extensively discuss Catholic social teaching on labor in David L. Gregory, *Catholic Labor Theory and the Transformation of Work*, 45 WASH. AND LEE L. REV. 119 (1987); David L. Gregory, *Dorothy Day's Lessons for the Transformation of Work*, 14 Hofstra Labor L. J. 57 (1996); David L. Gregory, *The Right to Unionize as a Fundamental Human and Civil Right*, 9 MISS. COLL. L. REV. 119 (1988); David L. Gregory and Charles J. Russo, *Overcoming NLRB v. Yeshiva University by the Implementation of Catholic Labor Theory*, 41 Labor L. J. 55 (1990). Catholic social teaching on the rights of workers became popularized in the Academy-Award winning film, *On the Waterfront* (1953), inspired by Jesuit priest John "Pete" Corridan's work against labor racketeering on the New York City shipping docks. The Nobel Peace Prize for 1996 was awarded to Catholic Bishop Carlos Belí, the apostolic administrator of Dili, the Capital of East Timor, for his social justice advocacy for the persecuted populations of Indonesia.

There is voluminous, important law review literature concerning the Taft-Hartley Act.² Regrettably, there is a relative paucity of law review literature on Catholic social teaching. This essay will hopefully contribute in some minor way to the former, and, more importantly, may spur other scholars and lawyers to study, and, especially, to implement in practice, the latter.

The Taft-Hartley Act was enacted by the Republican-led Congress over the veto of President Truman at the beginning of the "Golden Age" of the post-World War II economy. Within a few years of the Act becoming law, labor unions achieved unionization density of more than one-third of the nation's private sector workforce—whether unions did so because, or in spite of, the Taft-Hartley Act is an interesting question. For many related and unrelated reasons, private sector unionization made great strides throughout the first decade of the Taft-Hartley Act.

As part of that post-world War II milieu, Catholic social teaching on the rights of workers flourished in practice. Some elements of the Taft-Hartley Act are arguably deeply problematic regarding, and are probable impediments against, the enhancements of the fundamental human and civil rights to unionize, especially the Act's "states' right-to-work" mechanisms. Perhaps the fortuitous reminder of the timeless and universal truths of Catholic social teaching in the context of this Taft-Hartley Act "golden" anniversary, can spur over time the appropriate statutory modifications of those aspects of the Taft-Hartley Act that may have not fully fostered, or have even sadly debilitated, the achievement of universal moral truths.

Capital is the means in service of human needs. The human being, not capital, is superior as ends. To neglect or to distort this calculus results in the pernicious and immoral subordination of human beings to capital, and leads to unbridled, ruthless materialism.

The Catholic Church has always urged the appropriate moral calculus, with capital as a necessary and important means in the service of human beings. The international legal regime must effect and enhance fundamental human dignity, in which workers' rights are a critically important component. The moral voice of the Catholic Church is an eloquent instrument toward this transformative process, and the Taft-Hartley Act, regrettably, is decidedly less so.

This essay discusses the Church's salient teachings on the law of work. The right to unionize and the right to a "living wage" are at the apex of the Church's labor teachings. These two related themes are the focus of this essay.

I. THE RIGHT TO UNIONIZE

The right to unionize is a fundamental human and civil right.³ In the international legal regime, major Conventions Nos. 87 and 98 of the International Labor Organization protect workers' rights to associate freely, and to organize and to bargain collectively with their employers.⁴ Unfortunately, the United States is not a signatory to either of these Conventions.⁵ Equally appalling, the statutory labor relations law regime in the United States, exemplified by Section 2 of the

² Abraham, *How the Taft-Hartley Act Hindered Unions*, 12 HOFSTRA LAB.L.J. 1 (1994); Archibald Cox, *The Labor Management Relations Act—Some Aspects*, 61 HARV. L.REV. 1, 274 (1947-1948); W. L. Daykin, *Collective Bargaining and the Taft-Hartley Act*, 33 IOWA L.REV. 623 (1948); J.B. Olrerson, *Collective Bargaining and the Taft-Hartley Labor Act*, 23 VAL.REV. 549 (1947); S. H. Torff, *The Taft Hartley Act and Collective Bargaining*, 43 ILL. L.REV. 323

(1948); D. H. Wollett, *Collective Bargaining, Public Policy, and the National Labor Relations Act of 1947*, 23 WASH. L. REV. 205 (1948).

³ See, David L. Gregory, *The Right to Unionize as a Fundamental Human and Civil Right*, 9 MISS. COLL. L. REV. 135 (1988).

⁴ *Id.*

⁵ *Id.*

National Labor Relations Act⁶ and reinforced by case law,⁷ removes supervisors, managers, domestic workers, and agricultural workers from the protections of the NLRA.⁸ Since these workers are not considered "employees" within the meaning of the Act, they are beyond the bounds of the Act's direct protections.

The Catholic Church's eloquent and long-standing social teaching on the rights of all workers continues to be a beacon of jurisprudential and practical hope, transcending the often crabbed and hostile policies of particular nation-states toward the rights of workers to unionize.⁹ Catholic social teaching does not artificially draw unduly narrow distinctions among the classes of workers who should be eligible to unionize.

The tensions regarding the welfare workforce are pervasively suffused with moral and ethical as well as gripping and immediate practical, economic issues. Catholic social teaching on the rights of workers to unionize can be a powerful rhetorical instrument to facilitate appropriate changes in both legislation and in broader public policy. Such changes might regard the welfare workforce as "employees" from the perspective of having the fundamental human and civil rights to unionize.

These dynamics can be best appreciated by reviewing the salient provisions of Catholic social teaching on the rights of workers to unionize, primarily through the instruments of the Papal encyclicals and related Bishops' pastoral letters, commencing with Pope Leo XIII's encyclical, *Rerum Novarum*, promulgated in 1891.

Pope Leo XIII began the development of definitive Catholic social teaching on the rights of workers in his classic Papal encyclical *RERUM NOVARUM* (ON THE CONDITION OF LABOR) in 1891.

In the first place employers and workmen may themselves effect much in the matter of which we treat, by means of those institutions and organizations which afford opportune assistance to those in need, and which draw the two orders more closely together... The most important of all are workmen's associations for these virtually include all the rest. History attests what excellent results were effected by the artificer's guilds of a former day. They were the means not only of many advantages to the workmen, but in no small degree of the advancement of art, as numerous monuments remain to prove. Such associations should be adapted to the requirements of the age in which we live—an age of greater instruction, of different customs, and of more numerous requirements in daily life. It is gratifying to know that there are actually in existence not a few societies of this nature, consisting of workmen alone, or of workmen and employers together; but it were greatly to be desired that they should multiply and become more effective.¹⁰

Pope Pius XI continued these themes in the Papal encyclical *QUADRAGESIMO ANNO* ["AFTER FORTY YEARS"] in 1931.

Worthy of all praise, therefore, are the directions authoritatively promulgated by Leo XIII, which served to break down this opposition (between government and unions) and dispel these suspicions. They have still a

⁶ 29 U.S.C. 152(11).

⁸ 29 U.S.C. 152(3).

⁷ *NLRB v. Bell Aerospace Co.*, 416 U.S. 267 (1974) (managers are not "employees" protected by the NLRA); *NLRB v. Yeshiva Univ.*, 444 U.S. 672 (1980) (university faculty are supervisors or managers, and thus not "employees" protected by the NLRA).

⁹ See *supra* note 1.

¹⁰ Pope Leo XIII, *RERUM NOVARUM* (ON THE CONDITION OF LABOR) 36 (1891).

higher distinction, however, that of encouraging Christian workingmen to form unions according to their several trades of teaching them how to do so. The encyclical *Rerum Novarum* declared quite opportunely that in establishing associations of this kind, they should be so organized and directed as to furnish a very apt and suitable means for achieving what is aimed at, namely each member better his condition so far as possible as regards body, soul, and property.' Eager to carry out to the full of the program of Leo XIII, the clergy and many of the laity devoted themselves every where with admirable zeal to the creation of such unions, which in turn became instrumental in building up a body of truly Christian workingmen.¹¹

Pope John XXIII reaffirmed these teachings in *MATER ET MAGISTRA* ["Christianity and Social Progress"] in 1961.

In the same letter (*Quadragesimo Anno*), moreover, there is affirmed the natural right to enter corporately into associations, whether these be composed of workers only or of workers and management; and also the right to adopt that organizational structure judged most suitable to meet their professional needs. And workers themselves have the right to act freely and on their own initiative within the above mentioned associations, without hindrance and as their needs dictate. Workers and employers should regulate their mutual relations in a spirit of human solidarity and in accordance with the bond of Christian brotherhood. For the unregulated competition which so-called *liberals* [read: *laissez-faire* capitalists] espouse, or the class struggle in the *Marxist* sense, are utterly opposed to Christian teaching and also to the very nature of man.¹²

The Papal encyclicals were crystallized in the documents of the Second Vatican Council, *GAUDIUM ET SPES* (THE PASTORAL CONSTITUTION ON THE CHURCH IN THE MODERN WORLD) in 1965.

Among the basic rights of the human person must be counted the right of freely founding labor unions. These unions should be truly able to represent the workers and to contribute to the proper arrangement of economic life. Another such right is that of taking part freely in the activity of these unions without risk of reprisal. Through this sort of orderly participation, joined with an ongoing formation in economic and social matters, all will grow day by day in the awareness of their own function and responsibility. Thus they will be brought to feel that according to their own proper capacities and aptitudes they are associates in the whole task of economic and social development and in the attainment of the universal common good.

When, however, socioeconomic disputes arise, efforts must be made to come to a peaceful settlement. Recourse must always be had above all to sincere discussion between the parties. Even in present-day circumstances, however, the strike can still be a necessary, though ultimate means for the defense of the workers' own rights and the fulfillment of their just demands.¹³

¹¹ Pope Pius XI, *QUADRAGESIMO ANNO* (AFTER FORTY YEARS) 31-33 (1931).

¹² Pope John XXIII, *MATER ET MAGISTRA* (MOTHER AND TEACHER: CHRISTIANITY AND SOCIAL PROGRESS") 31-33 (1961).

¹³ Second Vatican Council, *GAUDIUM ET SPES* (PASTORAL CONSTITUTION ON THE CHURCH IN THE MODERN WORLD) 68 (1965).

Pope Paul VI was even more expressive in his encyclical *OCTOGESIMA ADVENIENS (A CALL TO ACTION)* in 1971.

Every man has the right to work, to a chance to develop his qualities and his personality in the exercise of his profession, to equitable remuneration which will enable him and his family 'to lead a worthy life on the material, social, cultural and spiritual level,' and to assistance in the case of need arising from sickness or age. Although for the defense of these rights democratic societies accept today the principle of labor union rights, they are not always open to their exercise. The important role of union organizations must be admitted: their object is the representation of the various categories of workers, their lawful collaboration in the economic advance of society, and the development of the sense of their responsibility for the realization for the common good.¹⁴

Pope John Paul II was most explicit in his encyclical, *LABOREM EXERCENS (ON HUMAN WORK)* in 1981.

All these rights, together with the need for the workers themselves to secure them, give rise to yet another right: the right of association, that is, to form associations for the purpose of defending the vital interests of those employed in the various professions. These associations are called labor or trade unions... (Unions) are indeed a mouthpiece for the struggle for social justice, for the just rights of working people in accordance with their individual professions.¹⁵

The Catholic Bishops of the United States applied these universal church teachings to the United States in their pastoral letter, *ECONOMIC JUSTICE FOR ALL*, in 1986.

The Church fully supports the right of workers to form unions or other associations to secure their rights to fair wages and working conditions. This is a specific application of the more general right to associate. In the words of Pope John Paul II, 'The experience of history teaches that organizations of this type are an indispensable element of social life, especially in modern industrialized societies.' Unions may also legitimately resort to strikes where this is the only available means to the justice owed to workers. No one may deny the right to organize without attacking human dignity itself. Therefore, we firmly oppose organized efforts, such as those regrettably now seen in this country, to break existing unions and prevent workers from organizing.¹⁶

Most recently, Pope John Paul II summarized in the Papal encyclical, *CENTESIMUS ANNUS (ON THE HUNDREDTH ANNIVERSARY OF RERUM NOVARUM)* in 1991.

Prominent among these (rights), because of the space which the pope (Leo XIII) devotes to it and the importance which he attaches to it, is the 'natural human right' to form private associations. This means above all the right to establish professional associations of employers and workers, or of workers alone. Here we find the reason for the Church's defense and approval of the establishment of what are commonly called trade unions: certainly not because of ideological prejudices or in order to

¹⁴ Pope Paul VI, *OCTOGESIMA ADVENIENS (A CALL TO ACTION)* 14 (1971).

¹⁵ Pope John Paul II, *LABOREM EXERCENS (ON HUMAN WORK)* 20 (1981).

¹⁶ NATIONAL CONFERENCE OF CATHOLIC BISHOPS, *ECONOMIC JUSTICE FOR ALL* 104 (1986).

surrender to a class mentality, but because the right of association is a natural right of the human being, which therefore precedes his or her incorporation into political society. Indeed, the formation of unions 'cannot ... be prohibited by the state,' because 'the state is bound to protect natural rights, not to destroy them; and if it forbids its citizens to form associations, it contradicts the very principle of its own existence.

The Pope immediately adds another right which the worker has as a person. This is the right to a 'just wage,' which cannot be left to the 'free consent of the parties, so that the employer, having paid what was agreed upon, has done his part and seemingly is not called upon to do anything beyond.' ... A workman's wages should be sufficient to enable him to support himself, his wife and his children.¹⁷

II. THE "LIVING WAGE" INITIATIVE

In 1992, 18% of Americans with full time jobs nevertheless had annual earnings of less than \$13,091,¹⁸ while the official definition of poverty for a family of four in 1992 was \$14,428.¹⁹ In 1979, only 12% of all full-time workers earned comparably low wages.²⁰ The minimum wage of 1968, adjusted for inflation, would be \$7.20 today.²¹ The number of people not earning a living wage is increasing dramatically, and the minimum wage has fallen significantly below the amount needed to live above poverty. Some local governments have decided to mandate that a "living wage" be paid by those presuming to do business with government.

The "living wage" principle is rooted in Catholic social teaching regarding the rights of workers. It has been repeatedly elucidated in papal encyclicals and in bishops' pastoral letters, ranging from the first great social labor encyclical, *Rerum Novarum*, in 1891, to the United States National Conference of Catholic Bishops' unanimous ten-point reaffirmation *Catholic Framework for Economic Life*,²² in 1996, of their 1986 pastoral letter, *Economic Justice For All*.²³ Within the domestic economy, the United States Bishops applied these universal theories; "the Church fully supports the right of workers to form unions or other associations to secure their rights to fair wages and working conditions;"²⁴ "all people have the right to economic initiative, to productive work, to just wages and benefits, to decent working conditions as well as to organize and join unions or other associations."²⁵ Some of the most eloquent language ever concentrated on the issues of just compensation are found in the Catholic papal encyclicals.

For example, in *Rerum Novarum* in 1891, Pope Leo XIII declared:

Wages ought not to be insufficient to support a frugal and well-behaved earner. If through necessity or fear of a worse evil the workman accepts harder conditions because an employer contractor will afford no better, he is made the victim of force and injustice...

¹⁷ Pope John Paul II, CENTESIMUS ANNUS (ON THE HUNDREDTH ANNIVERSARY OF RERUM NOVARUM) 7-8 (1991).

¹⁸ Robert A. Rosenblatt, *Survey Finds Sharp Rise in Working Poor Salaries: The Number of Full Time Workers Who Earn Less Than a Living Wage rose from 12% to 18% in 13 years*, THE LOS ANGELES TIMES, March 31, 1994, at 1.

¹⁹ *Id.*

²⁰ *Id.*

²¹ Paul Winslow, *Missouri Must Raise the Minimum Wage*, ST. LOUIS DISPATCH, August 21, 1996, at 6B.

²² Robert A. Sirico, *The Bishops' Big Economic Tent*, Wall St. J., Dec. 10, 1996, A22.

²³ See note 1, *supra*. For an excellent essay summarizing Papal encyclicals on the just, living wage, see, James K. Fitzpatrick, *The Dilemma Of Catholic Corporate Executives*, NEW OXFORD REVIEW (Dec. 1996).

²⁴ UNITED STATES NATIONAL CONFERENCE OF CATHOLIC BISHOPS, *ECONOMIC JUSTICE FOR ALL* (104) (1986).

²⁵ UNITED STATES NATIONAL CONFERENCE OF CATHOLIC BISHOPS, *CATHOLIC FRAMEWORK FOR ECONOMIC LIFE* (1996).

Wages must be sufficient to enable him to maintain himself, his wife, and his children in reasonable comfort.²⁶

In 1931, Pope Pius XI continued to develop these principles in his encyclical, *Quadragesimo Anno*.

It violates right order ... whenever capital so employees the working or wage-earning classes as to divert business and economic activity entirely to its own arbitrary will and advantage without any regard to the human dignity of the workers, the social character of economic life, social justice and the common good..... Wealth, therefore, which is constantly being augmented by social and economic progress, must be so distributed among the various individuals and classes of society, that the needs of all of which Leo XIII spoke, be thereby satisfied.²⁷

Pope John XXIII continued in his encyclical, *Mater et Magistra*, in 1961:

The remuneration of work is not something that can be left to laws of the market; nor ought it to be fixed arbitrarily. It must be determined in accordance with justice and equity; which means that workers must be paid a wage which allows them to live a truly human life and to fulfill their obligations in a worthy manner.

To raise or to lower wages unduly, with a view to private advantage, and with no consideration for the common good, is therefore contrary to social justice.²⁸

In 1967, in his encyclical *Populorum Progressio*, Pope Paul VI stated:

It is unfortunate ... a system has been constructed which considers profit as the key motive for economic progress, competition as the supreme law of economics, and private ownership of the means of production as an absolute right that has no limits and carries no corresponding social obligation. This unchecked liberalism leads to dictatorship rightly denounced by Pius XI as producing 'the international imperialism of money.' One cannot condemn such abuses too strongly...²⁹

In 1971, Pope Paul VI further stated in *Octogesima Adveniens*:

Every man has the right to work, to a chance to develop his qualities and his personality in the exercises of his profession, to equitable remuneration which will enable him and his family 'to lead a worthy life on the material, social, cultural and spiritual level,' and to assistance in the case of need arising from sickness or age.³⁰

And, most recently, Pope John Paul II reiterated in his encyclical critique of materialism, *Centesimus Annus*, in 1991, commemorating the centennial of *Rerum Novarum*:

Profit is a regulator of the life of a business, but it is not the only one; other human and moral factors must also be considered which in the long term are at least equally important for the life of a business.³¹

Monsignor John Augustine Ryan of the Catholic University of America was the single most prominent living wage champion in the United States in the first part of the century. He labored aggressively for living wage legislation. He believed

²⁶ LEO XIII, *RERUM NOVARUM* (1891).

²⁷ PIUS XI, *QUADRAGESIMO ANNO* (1931).

²⁸ JOHN XXII, *MATER ET MAGISTRA* (1961).

²⁹ PAUL VI, *POPULORUM PROGRESSIO* (1967).

³⁰ PAUL VI, *OCTOGESIMA ADVENIENS* (1971).

³¹ JOHN PAUL II, *CENTESIMUS ANNUS* (1991).

that wages paid to the head of the household should be sufficient for every member of a family to perfect his or her rational nature;³² such wages were essential for individual self-development.³³ Ryan's beliefs were based on his formula for individual rights: "that every individual has a right to all things that are essential to the reasonable development of his personality."³⁴ Ryan was a champion of the New Deal, and favored the passage of the Fair Labor and Standards Act establishing the federal minimum wage.³⁵ Monsignor Ryan bridged Catholic social teaching into the New Deal legislative reforms. The legislative history of the FLSA indicates that a primary purpose of the minimum wage law was to provide a living wage.³⁶ President Roosevelt envisioned that the FLSA would guarantee a "living wage" and a "decent living" for all Americans.³⁷ Reports to Congress supported the goal of the minimum wage as a living wage; the purpose for the minimum wage was to establish a wage floor, a floor adequate to support life with human dignity, a just wage in return for a day's work.³⁸ Now, more than sixty years later, the New Deal alliance between religion and labor shows signs of resurgence in 1997.³⁹

CONCLUSION

After more than a century of Catholic social teaching, the right to unionize remains tenuously situated, at best, in many secular regimes. Welfare recipients are compelled to work without even minimum regard for their safety and health in their public workplaces, to say nothing (literally!) of their right to unionize.⁴⁰

While the nation has the prerogative to institute public policy choices very different from those of a prior era, and to repudiate much of FDR's New Deal, the law of the workplace, whether in the local, domestic, or global international arena, should remain cognizant of the moral teachings of the Church, especially regarding the rights of workers to form unions and to receive a living wage.

The universal, natural law truths undergirding workers' rights are indispensably important as theoretical and practical constructs, and the Catholic Church's contributions to these dynamics remain compelling.



³² For a thoughtful meditation on, in part, the work of Monsignor Ryan, see, Harlan R. Beckley, *Love, Human Dignity, and Justice: Some Legacies from Protestant and Catholic Ethics*, 66 NOTRE DAME L. REV. 1053, 1063 (1991).

³³ *Id.* at 1062.

³⁴ *Id.* at 1062.

³⁵ *Id.* at 1063.

³⁶ William P. Quigley, "A Fair Day's Pay for a Fair Day's Work": Time to Raise and Index the Minimum Wage, 27 ST. MARY'S L.J. 513, 529 (1996).

³⁷ *Id.*

³⁸ *Id.* at 530.

³⁹ AFL-CIO President John Sweeney asked the Vatican to issue a statement on workers' rights prior to the opening of the ministerial meeting of the World Trade Organization. 153 Labor Relations Reporter 487, 500 (December 16, 1996); REGINA BOTTERIL, THE FAITH & WORK CONGREGATIONAL STUDY GUIDE ON WORKER JUSTICE (1996).

Steven Greenhouse, *Labor and Clergy Reunite To Help Society's Underdogs*, N.Y. TIMES, Aug. 18, 1996, at A1 (steering committee of forty clerics forming the National Interfaith Committee for Worker Justice, following the New York State Labor-Religion Coalition. "John L. Car, secretary of the department of social development at the United States Conference of Bishops, said, 'a newly energized labor movement provides new opportunities to share our convictions and art on our teachings.'"); Steven Greenhouse, *Unions Unite Old Friends In Bashing Their Foes*, N.Y. TIMES, Nov. 22, 1996, B1 (workers' rights panels "seek to put into practice religious teachings about how workers should be treated.")

⁴⁰ For excellent analyses of the intersections of Catholic teaching and the welfare workforce, see *Symposium on Entitlements*, 11 Notre Dame J. Law, Ethics, and Pub. Policy 419 (1997).

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